

Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JOHN DOE,

Plaintiff,

v.

AMHERST COLLEGE, CAROLYN  
MARTIN, JAES LARIMORE, TORIN  
MOORE, SUSIE METTON SHANNON,  
and LAURIE FRANKL,

Defendants.

No. 16-MC-00128-RSL

DECLARATION OF JOHN CLUNE IN  
SUPPORT OF NON-PARTY SANDRA  
JONES' REPLY IN SUPPORT OF HER  
MOTION TO QUASH SUBPOENA OR  
IN THE ALTERNATIVE MOTION  
FOR A PROTECTIVE ORDER

I, JOHN CLUNE, declare under penalty of perjury of the laws of the United States of America that the following statements are true and correct and based on personal knowledge.

1. I am one of the counsel of record for Sandra Jones, a non-party in this matter.
2. My local co-counsel are Kathryn Goater and Rebecca Roe with Schroeter Goldmark & Bender.

DECLARATION OF JOHN CLUNE IN SUPPORT OF  
NON-PARTY SANDRA JONES' REPLY IN SUPPORT OF  
HER MOTION TO QUASH SUBPOENA OR IN THE  
ALTERNATIVE MOTION FOR A PROTECTIVE  
ORDER – 1

16-MC-00128-RSL

SCHROETER, GOLDMARK & BENDER  
500 Central Building • 810 Third Avenue • Seattle, WA 98104  
Phone (206) 622-8000 • Fax (206) 682-2305

**Exhibit**

3. Attached hereto are true and correct copies of the following documents:

Exhibit A	Plaintiff's Opposition to Defendants' Motion for Leave to File "Confidential Documents": Under Seal (Docket No. 75), in <i>Doe v. Amherst College et al.</i> , US Dist Ct, Dist of MA, Cause No. C.A. 3:15-cv-30097-MAP.
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I declare under penalty of perjury under the law of the United States of American that the foregoing is true and correct.

Executed at Boulder, Colorado, this 12<sup>th</sup> day of August , 2016.

s/John Clune

JOHN CLUNE, #27684

Attorney for Sandra Jones

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 12, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. I further certify that I have emailed the foregoing to the attorneys listed below.

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